

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 08 cr 417-14
vs.)	
)	Judge Amy J. St. Eve
)	
ALFRED L. WOLFF, INC.)	
)	

PROTECTIVE ORDER

Upon the government's unopposed motion for a Protective Order, and good cause having been shown, it is hereby ordered as follows:

1. For purposes of this Order, the term "Defense Counsel" means those attorneys on behalf of ALFRED L. WOLFF, INC. ("ALW INC."), who have filed an appearance before this Court in this matter.

2. For purposes of this Order, the term "PROHIBITED GROUP" means ALW INC's co-defendants as charged in the indictment, to include (i) ALEXANDER WOLFF; (ii) JÜRGEN BECKER; (iii) TOM WEICKERT; (iv) MARCEL BELTEN; (v) YI LIU; (vi) SVEN GEHRICKE; (vii) THOMAS MARTEN; (viii) THOMAS GERKMANN; (ix) STEFANIE GIESSELBACH; (x) MAGNUS VON BUDDENBROCK; (xi) GONG JIE CHEN, a/k/a "George Gao" and "George Chen;" (xii) ALFRED L. WOLFF GMBH; (xiii) ALFRED L. WOLFF HONEY GMBH; (xiv) ALFRED L. WOLFF (BEIJING) TRADE CO. LTD., CHINA; (xv) ALFRED L. WOLFF COMPANY LTD., HONG KONG, CHINA; and (xvi) QHD SANHAI HONEY CO., LTD.

3. For purposes of this Order, the term "Confidential Material" means: (i) government laboratory test procedures, protocols, and methodologies; and (ii) internal, non-public Department of

Commerce documents and records relating to, and arising from, the Department of Commerce's new shipper review of QHD SANHAI HONEY CO., LTD.

4. The Confidential Material shall be utilized by ALW INC. and Defense Counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding.

5. The Confidential Material shall not be physically disclosed either directly or indirectly to any person or entity other than ALW INC., Defense Counsel, persons employed or consulted by Defense Counsel to assist in the defense of this matter, or such other persons as to whom the Court may authorize disclosure. Any notes or records of any kind that Defense Counsel may make relating to the contents of the Confidential Material shall not be disclosed to anyone other than ALW INC., Defense Counsel, and persons employed by Defense Counsel to assist in the defense of this matter, or such other person as to whom the Court may authorize disclosure after notice to the government.

6. The Confidential Material shall not be copied or reproduced, except so as to provide copies of the material for use by each Defense Counsel and such persons as are employed by Defense Counsel to assist in the defense of this matter, and such copies and reproductions shall be treated in the same manner as the Confidential Material.

7. Upon conclusion of the trial in this case or upon the earlier resolution of charges against ALW INC., all Confidential Material and all copies made thereof shall be returned to the government or destroyed, unless otherwise ordered by the Court.

8. All Confidential Material withheld by the defense by express order of this Court shall be preserved only so long as is necessary for further proceedings related to this case, after which time they shall be returned to the United States or destroyed. The Court may require a certification as to the disposition of any such materials retained.

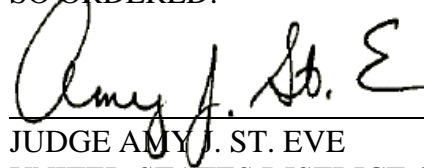
9. Notwithstanding any other provision of this Order, the Confidential Material shall under no circumstances physically leave the United States or otherwise be accessed outside of the United States, whether electronically or in hard copy form.

10. Notwithstanding any other provision of this Order, the Confidential Material shall under no circumstances physically be shared with, given to, or possessed by, either directly or indirectly, the PROHIBITED GROUP or any member of the PROHIBITED GROUP.

11. Any representative of Defense Counsel, including persons employed or consulted to assist in the defense of this matter, shall be informed of this Order and will abide by its conditions.

12. In all future public filings relating to these proceedings in which Confidential Material is discussed, excerpted, cited, or attached – other than when done so in general, overview form – such filings shall be under seal, unless otherwise ordered by the Court.

SO ORDERED:

A handwritten signature in black ink, appearing to read "Amy J. St. Eve", is written over a horizontal line.

JUDGE AMY J. ST. EVE
UNITED STATES DISTRICT COURT

DATED: March 8, 2011